

EXHIBIT D

2. Relator objects to the Requests where they seek disclosure of information protected by the attorney-client privilege, the work-product doctrine, the investigative-communications privilege, the common-interest privilege, and/or any other privileges and exemptions set forth in applicable law.

3. Relator objects to the Requests where they seek information not within Relator's possession, custody, or control.

4. Relator objects to the Requests where they call for information to be disclosed that is protected by the HIPAA Privacy Rule or is confidential by law.

5. Relator objects to the Requests where they are not properly limited to an appropriate time period. Answering Requests outside of an appropriate time period will be overly broad, unduly burdensome, and neither relevant to any party's claim or defense, nor proportional to the needs of the case, under FRCP 26(b)(1).

6. Defendants' definition of the term "Communication" is overly broad, vague, and answering Requests by searching for and producing documents with this definition would be unduly burdensome. Relator will interpret the term "communication" consistent with applicable FRCPs, rules, law, and common usage.

7. Defendants' definition of the term "Document" is overly broad, vague, and answering Requests with that definition would be unduly burdensome where the definition departs from the FRCPs and other applicable law. Relator will interpret the term "document" consistent with FRCP 34 and other applicable FRCPs, rules, and law.

8. Defendants' definition of the terms "Regarding," "relating to," "related

to,” “in relation to,” or “relates to” is overly broad, vague, and answering Requests by searching for and producing documents with that definition would be unduly burdensome. Relator will interpret the terms “Regarding,” “relating to,” “related to,” “in relation to,” or “relates to” consistent with applicable FRCPs, rules, law, and common usage.

9. Defendants’ definition and use of the terms “Relator,” “You,” and “Your” is overly broad and neither relevant to any party’s claim or defense, nor proportional to the needs of the case, under FRCP 26(b)(1). Answering Requests, and identifying and producing documents, with those terms as defined would be unduly burdensome. These terms as defined by Defendants include persons and entities with no relation to this matter. The terms’ vagueness and overbreadth make any Request with the terms as defined by Defendant exceed the scope of the specific claims and issues in this case and therefore makes those Requests objectionable. Relator will respond to Requests and produce responsive documents in Relator’s possession, custody or control in accordance with the applicable FRCPs.

10. Relator objects to all of Defendants’ Instructions which exceed the requirements of FRCP 34, or other applicable Rules or law. Relator will answer the Requests as required by FRCP 34, and other applicable Rules and law.

11. The responses made at this time are without prejudice to Relator’s rights to amend or supplement its responses as appropriate under FRCP 34 or other rules or law.

12. By answering these Requests and producing documents responsive to these Requests, Relator does not concede the relevance or admissibility of the documents, materials, or information. Relator further does not waive, but instead, expressly preserves, the Objections here.

13. Relator incorporates by reference the objections above into the responses set forth below. The failure to repeat any of the objections above does not waive any objection to the specific Request.

14. Relator intends to not produce documents which are privileged under the attorney-client, common interest, work-product, and government investigative privileges and protections. Any production of documents which are covered by the attorney-client, common interest, work product and government investigative privileges and protections is inadvertent under Federal Rule of Evidence 502.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

All documents identified in the Relator's Complaint, supporting your allegations in the Relator's Complaint, or that you relied on in making the allegations in the Relator's Complaint, your Rule 26 Initial Disclosures, Relator's Opposition to Motion to Dismiss [Dkt. No. 61], and your other filings in this case, including but not limited to, documents substantiating your version of events and showing the manner you contend the Planned Parenthood Defendants benefited or the Government, Texas, and Louisiana were harmed by the acts or omissions you allege.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 2

Documents sufficient to identify what are characterized in the Relator's Complaint, your Rule 26 Initial Disclosures, Relator's Opposition to Motion to Dismiss [Dkt. No. 61], and your other filings in this case as "claims" that were submitted to the Government, Texas, and Louisiana for payment, excluding patient names, patient dates of birth, patient marital status, insured names, insured dates of birth, insured marital status, or other patient information.

RESPONSE:

Relator refers Defendants to the Expert Reports of Donald Lochabay, the documents cited therein and produced to Defendants, and the documents contained in the trial and appellate record in the federal court litigation involving Defendants

referenced in Relator's Complaint.

REQUEST FOR PRODUCTION NO. 3

Transcribed, recorded, or written statements, correspondence, affidavits, or declarations relating to your claims in this case made by any persons or witnesses who have knowledge of, who claim to have knowledge of, or whom you contend have knowledge of, facts relevant to this case, including any documents received from any persons or witnesses relating to your claims in this litigation, or during the course of obtaining these statements, correspondence, affidavits, or declarations.

RESPONSE:

This request is overbroad and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator will produce witness statements as required under the FRCP and refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint.

REQUEST FOR PRODUCTION NO. 4

Notes of any conversations related to your claims in this case with any persons or witnesses who have knowledge of, who claim to have knowledge of, or whom you contend have knowledge of, facts relevant to this case.

RESPONSE:

This request is overbroad and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative

privileges and protections. Subject to Relator's objections and statements of privileges, Relator responds that Relator will produce documents responsive to this request, if any.

REQUEST FOR PRODUCTION NO. 5

All documents provided to, reviewed by, relied upon, or created by any expert witness for you or Texas.

RESPONSE:

This request is overbroad and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants.

REQUEST FOR PRODUCTION NO. 6

All documents and communications between you and Texas that relate to compensation for any expert's study or testimony in this case, identify facts or data that you or Texas's attorney(s) provided and that the expert considered in forming the opinions to be expressed by the expert, and/or identify assumptions that Texas or Relator provided and that the expert relied on in forming the opinions to be expressed in this case.

RESPONSE:

This request is overbroad and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative

privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants.

REQUEST FOR PRODUCTION NO. 7

All documents you relied on in drafting your responses to Interrogatories or Requests for Admission issued by any of the Defendants in this case.

RESPONSE:

This request is overbroad and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the response to Request No. 1 above and will produce other documents responsive to this request, if any.

REQUEST FOR PRODUCTION NO. 8

All documents identified in your responses to Interrogatories or Requests for Admission issued by any of the Defendants in this case.

RESPONSE:

See Response to Request No. 1 above. Relator will produce other documents responsive to this request, if any.

REQUEST FOR PRODUCTION NO. 9

All documents related to every claim for payment submitted by each Affiliate Defendants that you contend was submitted in violation of the False Claims Act, the Texas Medicaid Fraud Prevention Act, or the Louisiana Medical Assistance

Programs Integrity Law. This request does not seek patients' names, patient dates of birth, patient marital status, insured names, insured dates of birth, insured marital status, or other patient identifying information associated with the claims.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 10

All documents related to every overpayment received by each of the Affiliate Defendants that you contend Affiliate Defendants were obligated to report and return, but did not. This request does not seek patients' names, patient dates of birth, patient marital status, insured names, insured dates of birth, insured marital status, or other patient information associated with the claims.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are

covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 11

All documents relating to or reflecting communications with the Center for Medical Progress from 2013 to the present relating to the allegations in Relator's Complaint.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 12

All documents relating to or reflecting communications with Texas from 2013 to the present relating to the allegations in Relator's Complaint or Texas' Complaint.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 13

All documents relating to or reflecting communications with Louisiana from 2013 to the present relating to the allegations in Relator's Complaint.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in

the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 14

All documents and communications relating to any fetal tissue procurement or donation in which any Medicaid, Texas Medicaid, or Louisiana Medicaid provider unrelated to Planned Parenthood participated or facilitated or agreed to participate or facilitate.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 15

All documents and communications relating to the participation or alleged participation or facilitation of any Planned Parenthood Defendant in any fetal tissue procurement or donation.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 16

All documents and communications relating to any investigation Relator, the Center for Medical Progress, and/or third parties acting on Relator's behalf have conducted or are conducting from 2010 to the present into participation, past or present, by any Medicaid, Texas Medicaid, or Louisiana Medicaid provider unrelated to Planned Parenthood in fetal tissue procurement, including but not limited to the plans for the investigation, interview methodology, investigative notes, and documents sufficient to show participants in the investigation.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants

referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 17

All documents and communications with Medicaid, Texas Medicaid, and/or Louisiana Medicaid regarding any investigation Relator, the Center for Medical Progress, and/or third parties acting on Relator's behalf have conducted or are conducting from 2010 to the present into participation or facilitation, past or present, by any Medicaid, Texas Medicaid, or Louisiana Medicaid provider unrelated to Planned Parenthood in fetal tissue procurement or donation.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 18

All documents and communications related to whether participation in or an agreement to participate in or facilitate any fetal tissue procurement or donation, or conduct relating to such participation or facilitation, renders a Medicaid provider unqualified to provide service under Medicaid, Texas Medicaid, or Louisiana

Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 19

All documents and communications relating to Texas's decision to grant the Grace Period to PPGC, PPST, and PPGT, including but not limited to documents and communications relating to the Affiliate Defendants status as Medicaid providers before or during the Grace Period.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas.

REQUEST FOR PRODUCTION NO. 20

All documents and communications relating to whether termination of any Affiliate Defendant violated Medicaid's free choice of provider requirement and if so, why.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 21

All documents and communications relating to the continued participation of any Affiliate Defendant in Louisiana Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in

the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 22

All documents and communications relating to whether any Planned Parenthood Defendant had an obligation to repay any amount paid by Medicaid, Texas Medicaid, or Louisiana Medicaid to any Affiliate Defendant.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 23

All documents and communications relating to whether Medicaid, Texas

Medicaid, and/or Louisiana Medicaid could or should seek recoupment of amounts reimbursed to any Planned Parenthood Defendant from 2010 to the present.

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 24

All documents and communications relating to termination by the United States, Texas, or Louisiana of any Medicaid provider unrelated to Planned Parenthood for violations of laws or regulations related to medical research, fetal tissue procurement, or an agreement to engage in fetal tissue procurement, including but not limited to whether any terminated federal, Texas, or Louisiana Medicaid provider was asked to return amounts reimbursed under federal, Texas, or Louisiana Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are

covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 25

All documents and communications relating to termination by the United States, Texas, and/or Louisiana of any Medicaid, Texas Medicaid, or Louisiana Medicaid provider on basis that the entity was not a qualified provider, including but not limited to whether any terminated Medicaid provider was asked or obligated to return amounts reimbursed under Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 26

All documents and communications relating to any Affiliate Defendants'

qualifications to provide services under Medicaid, Texas Medicaid, or Louisiana Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the Expert Reports of Donald Lochabay and the documents cited therein and produced to Defendants, the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 27

All documents and communications relating to Texas's determination that any Affiliate Defendant is not a qualified provider under Medicaid, Texas Medicaid, or Louisiana Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in

the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 28

All documents and communications relating to Louisiana's determination that any Affiliate Defendant is not a qualified provider under Medicaid, Texas Medicaid, or Louisiana Medicaid.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 29

All documents and communications between you, including third parties acting on your behalf (including but not limited to Americans United for Life, Susan B. Anthony List, and the Federalist Society), and members of the United States Congress (including their staff) or the Government related to the Center for Medical

Progress videos.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 30

All documents and communications between you, including third parties acting on your behalf (including but not limited to Americans United for Life, Susan B. Anthony List, and the Federalist Society), and Texas related to the Center for Medical Progress videos.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants

referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 31

All documents and communications between you, including third parties acting on your behalf (including but not limited to Americans United for Life, Susan B. Anthony List, and the Federalist Society), and Louisiana related to the Center for Medical Progress videos.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 32

All communications between you, including third parties acting on your behalf (including but not limited to CRC Public Relations), and the Media relating to

the Center for Medical Progress videos.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 33

All documents that you provided to or received from the Government relating to your claims or otherwise providing an account of your investigation and alleged observations of any Affiliate Defendants' participation in or facilitation of, or agreement to participate in or facilitate, fetal tissue procurement or donation, or of any conduct relating to such participation, facilitation, or agreement.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in

the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 34

All documents that you provided to or received from Texas relating to your claims or otherwise providing an account of your investigation and alleged observations of any Affiliate Defendants' participation in or facilitation of, or agreement to participate in or facilitate, fetal tissue procurement or donation, or of any conduct relating to such participation, facilitation, or agreement.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 35

All documents that you provided to or received from the Louisiana relating to your claims, or otherwise providing an account of your investigation and alleged observations of any Affiliate Defendants' participation in or facilitation of, or agreement to participate in or facilitate, fetal tissue procurement or donation, or of any conduct relating to such participation, facilitation or agreement.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 36

All communications between you and the Media relating to any Planned Parenthood Defendant's qualifications to provide service under Medicaid, Texas Medicaid, and/or Louisiana Medicaid; any Planned Parenthood Defendant's termination in Texas and/or Louisiana; continued participation of any Planned Parenthood Defendant in Louisiana Medicaid; whether conduct relating to participation in fetal tissue procurement or donation an agreement to participate in or facilitate fetal tissue procurement or donation rendered a Medicaid provider

unqualified to provide service under Medicaid, Texas Medicaid, or Louisiana Medicaid; and whether Medicaid, Texas Medicaid, and/or Louisiana Medicaid could or should seek recoupment for amounts reimbursed to any Planned Parenthood Defendant from 2010 to the present.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 37

All Center for Medical Progress videos (both edited and unedited), including but not limited to all such videos you or third parties acting on your behalf provided to the Government (including Congress), Texas, and/or Louisiana.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and

statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 38

All documents, including communications, supporting any claim for damages alleged in the Relator's Complaint.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

REQUEST FOR PRODUCTION NO. 39

All documents and communications supporting your allegation that each Affiliate Defendant participated in fetal tissue procurement.

RESPONSE:

This request is overbroad, not relevant, and asks for documents which are covered by the attorney-client, common interest, work product, and government investigative privileges and protections. Subject to Relator's objections and statements of privileges, Relator refers Defendants to the documents contained in the trial and appellate record in the federal court litigation involving Defendants referenced in Relator's Complaint, the documents referenced and/or produced by the State of Texas in response to Request No. 1 in Defendants' First Set of Requests for Production to the State of Texas, and documents produced by Relator at REL_000001-REL_010489.

Respectfully submitted.

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CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2022, a true and correct copy of the foregoing document was sent by electronic mail to Defendants' counsel to the e-mail addresses below:

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